

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SONY BMG MUSIC ENTERTAINMENT,
a Delaware general partnership; MOTOWN
RECORD COMPANY, L.P., a California
limited partnership; WARNER BROS.
RECORDS INC., a Delaware corporation;
BMG MUSIC, a New York general
partnership; UMG RECORDINGS, INC., a
Delaware corporation; and LAFACE
RECORDS LLC, a Delaware limited liability
company,

Plaintiffs,

v.

STEFANIE BAXTER,

Defendant.

) Case No.: 08 C 469

) Honorable John W. Darrah

MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION

Plaintiffs, Sony BMG Music Entertainment, Motown Record Company, L.P., Warner Bros. Records Inc., BMG Music, UMG Recordings, Inc., and Laface Records LLC (collectively, the "Plaintiffs"), by and through their undersigned attorneys, and pursuant to Rule 55 of the Federal Rules of Civil Procedure, hereby move for the entry of default judgment and a permanent injunction against Defendant Stefanie Baxter ("Defendant"). In support thereof, Plaintiffs respectfully state as follows:

1. On January 22, 2008, Plaintiffs filed their Complaint for Copyright Infringement (the "Complaint") against Defendant.

2. On February 7, 2008, Defendant was served with a Summons to appear in the above-captioned proceeding. As such, Defendant's responsive pleading was due on or before February 27, 2008.

3. Defendant has not appeared in this action and has not filed a responsive pleading to the Complaint.

4. Accordingly, Plaintiffs hereby move for entry of a specific default judgment against Defendant pursuant to Rule 55 of the Federal Rules of Civil Procedure.

5. Plaintiffs request statutory damages pursuant to 17 U.S.C. § 504(c) in the amount of \$6,000.00, costs pursuant to 17 U.S.C. § 505 in the amount of \$420.00, and the requested permanent injunction as set forth more fully in the Memorandum in Support of Plaintiffs' Motion for Default Judgment and Permanent Injunction (the "Memorandum"), filed contemporaneously herewith.

WHEREFORE, for the reasons stated herein and in the Memorandum, Plaintiffs respectfully request that the Court enter an Order for (1) default judgment in favor of Plaintiffs and against Defendant; (2) statutory damages in the total amount of \$6,000.00; (3) an injunction in the form sought in the Complaint; (4) costs of \$420.00; and (5) for any other relief this Court deems appropriate under the circumstances.

Respectfully submitted,

SONY BMG MUSIC ENTERTAINMENT;
MOTOWN RECORD COMPANY, L.P.;
WARNER BROS. RECORDS INC.; BMG
MUSIC; UMG RECORDINGS, INC.; and
LAFACE RECORDS LLC,

DATED: March 18, 2008

By: /s/ Ann Marie Bredin

One of their attorneys

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